

HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD • BEDFORD, OHIO 44146-4493 • 216 / 232-9400 • FAX 216 / 232-9477

Over Forty Years of Quality Products and Services

CERTIFIED MAIL

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MAR 18 1993

March 15, 1993

Ms. Gertrud Matuschkovitz
U.S. EPA, Waste Management Div.
77 West Jackson Blvd.
Chicago, Illinois 60604

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

US EPA RECORDS CENTER REGION 5



526389

Dear Ms. Matuschkovitz:

Per our 2/22/93 telcon, I am requesting that Hukill Chemical Corporation (HCC) be "CERCLA Approved" to receive and reclaim Superfund Waste.

HCC is a solvent reclaimer, fuels blender and distributor of industrial chemicals. They have been operating at this location for twenty-five years. HCC is an Interim Status facility and expects to get its Part B Permit from the Ohio EPA by midyear.

I have enclosed copies of the last Ohio EPA compliance inspection violation notice and their response to HCC's corrective actions, per your request. We have submitted, 1/28/93, a logic flow sheet for the hazardous waste tracking system implemented in response to Violation 6.

Please contact me if you have any questions or comments on the above. Also, please advise me when you expect the site inspection to be scheduled. I can be reached at Hukill Chemical (216) 232-9400.

Sincerely yours,

Edgar M. Price
Engineering Consultant

enclosures:

cc: Robert L. Hukill, President
John Hukill, Sales Manager
Mike Mraz, Plant Manager

CHEMICAL DISTRIBUTION • SOLVENT RECLAIMING • HAZARDOUS WASTE SERVICES

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State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171
FAX (216) 487-0769

cc: Mike -
Mark
1/4/93

George V. Voinovich
Governor

December 29, 1992

RE: HUKILL CHEMICAL CORP.
OHD 001 926 740
#02-18-0315
CUYAHOGA COUNTY

Mr. Ed Price
Engineering Consultant
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146-4493

Dear Mr. Price:

Thank you for your submittals dated October 26, 1992, and October 30, 1992.

→ T.D.P.'s Tank System Assessment for 13-15-19.
Based upon the information you have provided it appears that your facility is now in compliance for violations 1, 2, 3, 4, and 5 noted in the September 30, 1992, letter regarding violations observed during the September 23 and 28, 1992, RCRA compliance inspection.

The following violation will remain outstanding until the described requirements are met:

1. Violation 6: It is not clear how the facility will be able to track wastes through the fuels blending process for purposes of identification of wastes codes for manifesting to cement kilns. The facility has not been successfully using generator knowledge to identify this waste stream. The Waste Analysis Plan in the Part B permit application states that "if information from the generator's analysis and knowledge of the constituents or information from similar processes is not available, a sample must be sent to an outside testing facility ...where the TCLP... will be used to determine mobility of both organic and inorganic contaminants". If this is the Waste Analysis Plan the facility is currently operating under, the facility is in violation of O.A.C. 3745-59-07 and O.A.C. 3745-52-11 for waste analysis and recordkeeping. The facility continues to be out of compliance with O.A.C. 3745-59-07 and O.A.C. 3745-52-11 until a plausible method of waste characterization is identified and presented to the Ohio EPA.

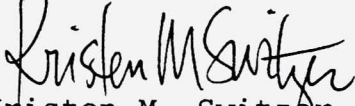
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Mr. Ed Price
December 29, 1992
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If you have any questions regarding this letter or any other compliance issues, please contact me at (216) 963-1107.

Sincerely,

A handwritten signature in cursive script, reading "Kristen M. Switzer".

Kristen M. Switzer
Environmental Scientist
Division of Hazardous Waste
Management

KMS/fwn

cc: Paul Anderson, DHWM, NEDO
Laurie Stevenson, DHWM, CO
Robert Hukill, Hukill Chemical Corp.

HUKILL CHEMICAL CORPORATION

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MAIL



Ms. Gertrud Matuschkovitz
U.S. EPA, Waste Management Division
77 West Jackson Blvd.
Chicago, Illinois 60604

HRE-8J

MC



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right of the return address